

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. No. 579, 607 & 619

CERTIFICATION OF COUNSEL

I, Matthew R. Pierce, counsel to the above-captioned debtors and debtors-in-possession (the “Debtors”), hereby certify as follows to the best of my knowledge, information and belief:

1. On January 25, 2023, the Debtors and the Official Committee of Unsecured Creditors appointed in the above-captioned cases (the “Committee”) filed with the United States Bankruptcy Court for the District of Delaware (the “Court”) the *Joint Motion of the Debtors and the Official Committee of Unsecured Creditors for Entry of an Order Pursuant to Bankruptcy Rule 2004 and Local Rule 2004-1 Authorizing Examinations* [D.I. 579] (the “Motion”).

2. On February 2, 2023, the Office of the United States Trustee (the “U.S. Trustee”) filed the *Limited Objection of the United States Trustee to Rule 2004 Motions* [D.I. 607] (the “Limited Objection”).

3. On February 5, 2023, the Debtors and the Committee filed the *Reply of the Debtors and the Official Committee of Unsecured Creditors in Support of Motions Authorizing Rule 2004 Examinations* [D.I. 619].

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

4. As of the date hereof, no other formal objections or other formal or informal responses to the Motion have been filed or served on the Debtors or the Committee.

5. The Debtors are in discussions with counsel to most of the Insiders and are currently receiving cooperation with respect to the Requests from Mr. Wang, Mr. Singh, Ms. Wang, Mr. Bankman, Ms. Fried, and Mr. Gabriel Bankman-Fried. Discussions continue with counsel to Ms. Ellison. Mr. Samuel Bankman-Fried remains non-responsive.

6. To resolve the Limited Objection, the Debtors and the Committee have revised the proposed form of order (the “Revised Order”), a copy of which is attached hereto as **Exhibit A**. A copy of the Revised Order compared against the proposed form of order attached to the Motion is attached hereto as **Exhibit B**. The U.S. Trustee and the Committee have no objection to the entry of the Revised Order. In accordance with the Court’s electronic order processing procedures, a clean copy of the Revised Order shall be uploaded to CM/ECF.

7. Accordingly, the Debtors respectfully request that the Court enter the Revised Order at its earliest convenience.

Dated: February 7, 2023
Wilmington, Delaware

LANDIS RATH & COBB LLP

/s/ Matthew R. Pierce

Adam G. Landis (No. 3407)
Kimberly A. Brown (No. 5138)
Matthew R. Pierce (No. 5946)
919 Market Street, Suite 1800
Wilmington, Delaware 19801
Telephone: (302) 467-4400
Facsimile: (302) 467-4450
E-mail: landis@lrclaw.com
brown@lrclaw.com
pierce@lrclaw.com

-and-

SULLIVAN & CROMWELL LLP

Andrew G. Dietderich (admitted *pro hac vice*)
James L. Bromley (admitted *pro hac vice*)
Brian D. Glueckstein (admitted *pro hac vice*)
Alexa J. Kranzley (admitted *pro hac vice*)
125 Broad Street
New York, NY 10004
Telephone: (212) 558-4000
Facsimile: (212) 558-3588
E-mail: dietdericha@sullcrom.com
bromleyj@sullcrom.com
gluecksteinb@sullcrom.com
kranzleya@sullcrom.com

*Counsel for the Debtors
and Debtors-in-Possession*